IRS and The George Washington University Law School to Sponsor Institute on International Tax Issues

## Announcement 2009-77

The Internal Revenue Service announces the Twenty-Second Annual Institute on Current Issues in International Taxation, jointly sponsored by the Internal Revenue Service and The George Washington University Law School, to be held on December 10 and 11, 2009, at the J.W. Marriott Hotel in Washington, DC. Registration is currently underway for the Institute, which is intended for international tax professionals.

The program will present a unique opportunity for top IRS and Treasury officials and tax experts, foreign government tax authorities, and leading private sector specialists, to address breaking issues and present key perspectives on new developments.

The first day will also feature sessions on:

- Competent Authority
- Permanent Establishment: When You See It, When You Don't
- Current Topics in Repatriation Planning
- ➤ Losses in a Down Economy: International Issues and Planning Responses
- Emerging Issues in Cross-Border Workouts
- Offshore Tax Compliance in Today's Economy

The second day will focus on:

- Ethical Issues in International Tax Practice
- Outbound Update
- > Inbound Update
- Key Tax Issues in Contract Manufacturing Business Models

On the first day, Douglas H. Shulman, Commissioner of the Internal Revenue Service, will deliver the luncheon address. On the second day, Michael F. Mundaca, Acting Assistant Treasury Secretary for Tax Policy of the Treasury, will deliver the luncheon address. The second day will also include an "Ask the IRS" panel featuring senior officials from the Service.

Those interested in attending or obtaining more information should contact The George Washington University Law School, at <a href="http://www.law.gwu.edu/ciit">http://www.law.gwu.edu/ciit</a> .